



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY
T: 212.292.5390 • E: mail@ipcounselors.com
www.ipcounselors.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/3/2023

August 2, 2023

VIA ECF

Hon. Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Moonbug Entertainment Ltd., et al. v. 640350 Store, et al.*
Case No. 22-cv-5042 (AT)
Second Request For Extension of Time to Respond to June 6, 2023 Order

Dear Judge Torres,

We represent Plaintiffs Moonbug Entertainment Limited and Treasure Studio Inc. (“Plaintiffs”), in the above-referenced matter (the “Action”).¹ On June 6, 2023, the Court entered an Order, *inter alia*, directing Plaintiffs to provide additional information supporting personal jurisdiction as to each Defendant (“June 6, 2023 Order”). (Dkt. 48). For the reasons detailed below, Plaintiffs respectfully request a second extension of time to respond to the Court’s June 6, 2023 Order. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs respectfully submit the following:

1. **Original Deadline:** August 4, 2023
2. **The number of previous requests for adjournment:** This is Plaintiffs’ second request for an extension of time to respond to the June 6, 2023 Order.
3. **The reason for the current request:** As indicated in Plaintiffs’ first request for an extension of time to respond to the June 6, 2023 Order (Dkt. 49), the only means by which Plaintiffs can obtain data evidencing Defaulting Defendants’ sales of Counterfeit Products to consumers in New York to support Plaintiffs’ claim for personal jurisdiction is if AliExpress produces the same in compliance with the expedited discovery ordered in the Temporary Restraining Order (“TRO”). Plaintiffs have been corresponding with AliExpress’ local counsel who has indicated AliExpress’ willingness to cooperate with Plaintiffs’ request, however, AliExpress requires additional time to do so.
4. **Whether the adversary consents:** All of the Defendants remaining in this Action are currently in default, thus Plaintiffs did not seek their consent.
5. **Proposed alternative dates:** To the extent Plaintiffs receive the full expedited discovery from AliExpress, Plaintiffs respectfully propose filing their response to the June 6, 2023 Order by

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

Hon. Analisa Torres

August 2, 2023

Page 2

September 1, 2023. To the extent that AliExpress does not provide the expedited discovery or expresses an unwillingness to provide Plaintiffs with complete records, Plaintiffs respectfully propose to file a motion to compel by September 1, 2023.

Plaintiffs' counsel sincerely apologizes to the Court for the inconvenience caused by this delay and thanks the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle S. Futterman

Danielle S. Futterman (DY 4228)

dfutterman@ipcounselors.com

60 East 42nd Street, Suite 1250

New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391

Attorneys for Plaintiffs

*Moonbug Entertainment Limited and Treasure
Studio Inc.*

GRANTED.

SO ORDERED.

Dated: August 3, 2023

New York, New York



ANALISA TORRES
United States District Judge